

ATTACHMENT 9A

The following Case-by-Case MACT permits in other states have been identified that provide a precedent for DHEC to utilize the surrogates as proposed in the Pee Dee Notice of MACT Approval.

TABLE 9A-1. LIST OF CASE-BY-CASE MACT PERMITS USING SURROGATES

Facility	Location	Boiler Type	Surrogates Used for HAP Categories		
			Non-Hg Metal	Acid Gas	Organics
Santee Cooper Cross ¹	Pineville, SC	2 PC Boilers	PM	SO ₂	CO
Dominion Wise ²	Wise Co., VA	2 CFB Boilers	PM	-	CO
SWEPCO Turk ³	Hempstead Co., AR	1 PC Boiler	PM ₁₀ (fil)	-	VOC
Dynegy Plum Point ⁴	Mississippi Co., AR	1 PC Boiler	PM ₁₀	-	VOC
Wolverine ⁵	Rogers City, MI	2 CFB Boilers	PM	-	VOC ⁶
WPSC - Weston ⁷	Rothschild, WI	1 PC Boiler	PM ₁₀	SO ₂	VOC

¹ *Office of Environmental Quality Control Bureau of Air Quality – PSD, NSPS, Case-by-Case MACT, Synthetic Minor Construction Permit No. 0420-0030-CI. Santee Cooper Cross Generating Station, February 5, 2004.*

² *Article 7 (40 CFR Part 63 112(g)) Case-by-Case MACT Permit – Stationary Source Permit to Construct and Operate, Registration No. 11526. Virginia Electric and Power Company, June 30, 2008.*

³ *ADEQ Operating Air Permit No. 2123-AOP-R0. John W. Turk, Jr. Power Plant, November 5, 2008.* SWEPCO did not propose the use of SO₂ as a surrogate for acid gas HAP, and the Arkansas Department of Environmental Quality issued the permit with SWEPCO's requested HCl and HF limits. In the *Response to Comments 112(g) MACT Permit*, ADEQ did acknowledge the beneficial use of the SO₂ CEMS to support compliance with acid gas HAP (see response to comment No. 39 on page 106 of 125).

⁴ *ADEQ Operating Air Permit No. 1995-AOP-R2. Dynegy Services Plum Point LLC, January 11, 2008.*

⁵ *Draft Permit to Install No. 317-07 – Wolverine Power Supply Cooperative, Inc., September 9, 2008.*

⁶ Appendix 3 of the Fact Sheet for the Draft Permit to Install No. 317-07 identifies continuous monitoring of CO as compliance demonstration support for organic HAP, p. 46.

⁷ *Air Pollution Control Construction Permit No. 03-RV-248 – Wisconsin Public Service Corporation – Weston Plant, October 19, 2004. Condition I.A.12.a.*

TABLE 9A-2. LIST OF CASE-BY-CASE MACT PERMITS USING SURROGATES (CONTINUED)

Facility	Location	Boiler Type	Surrogates Used for HAP Categories		
			Non-Hg Metal	Acid Gas	Organics
Springerville ⁸	Springerville, AZ	2 PC Boilers	PM	HF ⁹	-
Intermountain 3 ¹⁰	Millard Co., UT	1 PC Boiler	PM	SO ₂	CO
NEVCO Sevier ¹¹	Sevier Co., UT	1 CFB Boiler	PM	SO ₂	CO
MidAmerican ¹²	Council Bluffs, IA	1 PC Boiler	PM	HCl	CO
Indeck-Elwood ¹³	Will Co., IL	2 CFB Boilers	PM	-	VOC
Spurlock 3 ¹⁴	Mason Co., KY	1 CFB Boiler	PM ₁₀	-	VOC

⁸ Arizona Department of Environmental Quality Air Quality Class I Permit No. 1001554, Company Name: Tucson Electric Power Company, Facility Name: Springerville Generating Station, April 29, 2002.

⁹ The Arizona Department of Environmental Quality outlined their support for the use of surrogates for non-mercury metal HAP and acid gas HAP in Section VI.B. of the *Technical Support Document and Statement of Basis for Modification to Tucson Electric Power Company Springerville Generating Station*, December 21, 2002. pgs. 67- 70.

¹⁰ State of Utah Department of Environmental Quality Division of Air Quality Approval Order: PSD Major Modification to Add Unit 3 at Intermountain Power Generating Station, No. DAQE-AN0327010-04, October 15, 2004. Utah Department of Environmental Quality provided support for their use of surrogates in their response to Comment #45, pgs. 23-25 of the Memorandum Re: Response to Comments received on IPSC Intent to Approve number DAQE-IN327010-04, To: Intermountain Power Service Corporation (IPSC) File (N327010), October 14, 2004.

¹¹ State of Utah Department of Environmental Quality Division of Air Quality Approval Order: Sevier Power Company's 270 MW Coal-Fired Power Plant, No. DAQE-AN2529001-04, October 12, 2004.

¹² Iowa Department of Natural Resources Air Quality PSD Construction Permit and Notice of MACT Approval, MidAmerican Energy Company, Permit No. 03-A-425-P, June 17, 2003.

¹³ Construction Permit – PSD Approval NSPS-NESHAP Emission Units, Indeck-Elwood LLC Electricity Generation Facility, Site ID No. 197035AAJ, October 10, 2003. The Illinois Environmental Protection Agency supported the use of surrogates in Section VIII of the *Project Summary for a Construction Permit Application from Indeck-Elwood, LLC for the Indeck-Elwood Energy Center, Elwood, Illinois*. The US EPA Environmental Appeals Board supported the Illinois Environmental Protection Agency's use of surrogates in PSD Appeal No. 03-04, decided September 21, 2006, see pgs. 87-88 in response to H. *Fluoride Emissions*.

¹⁴ Commonwealth of Kentucky Natural Resources and Environmental Protection Cabinet Department for Environmental Protection Division for Air Quality, Air Quality Permit for East Kentucky Power Cooperative, Inc.'s Hugh L. Spurlock Power Station, October 15, 2004.